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United States of America

6 IN THE UNITED STATES DISTRICT COURT

7 EASTERN DISTRICT OF CALIFORNIA

8

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 ANTHONY VARELA,

13 Defendant.

CASE NO. 1:24-CR-00033-DAD-BAM

STIPULATION TO VACATE STATUS  
CONFERENCE AS TO ANTHONY VARELA AND  
SET CASE FOR CHANGE OF PLEA AND ORDER

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15 **STIPULATION**

16 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
17 through defendant's counsel of record, hereby stipulate as follows:

18 1. By previous order, this matter was set for a status conference on August 27, 2025, at 1:00  
19 p.m.

20 2. By this stipulation, defendant now moves to vacate the status conference as to Anthony  
21 Varela and to set the case for a change of plea hearing on September 8, 2025, at 10:00 a.m. before  
22 the Hon. Dale A. Drozd. The proposed change of plea date represents the earliest date that all counsel  
23 are available, taking into account counsels' schedules, defense counsels' commitments to other clients,  
24 and the court's available dates for a change of plea hearing.

25 3. The parties agree and stipulate, and request that the Court find the following:

26 a) The discovery associated with this case is voluminous and includes tens of  
27 thousands of pages, including investigative reports, photographs and videos, as well as hundreds  
28 of hours of recorded telephone conversations pursuant to wiretap orders, many cellular phone

1 extractions, and large amounts of cellular telephone precise location data and vehicle tracker  
2 data. All this discovery has been either produced directly to counsel and/or made available for  
3 inspection and copying.

4 b) Defense counsel has received a plea agreement from the government and needs  
5 the additional time to finalize the agreement and meet with her client to prepare for the change of  
6 plea hearing.

7 c) Counsel for the defendant believes that failure to grant the above-requested  
8 continuance would deny him the reasonable time necessary for effective preparation, taking into  
9 account the exercise of due diligence.

10 d) The government does not object to the continuance.

11 e) Based on the above-stated findings, the ends of justice served by continuing the  
12 case as requested outweigh the interest of the public and the defendant in a trial within the  
13 original date prescribed by the Speedy Trial Act.

14 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
15 et seq., within which trial must commence, the time period of August 27, 2025 to September 8,  
16 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(i), B(ii), and  
17 B(iv) [Local Code T4] because the case is so unusual or so complex, due to the number of  
18 defendants, the nature of the prosecution, or the existence of novel questions of fact or law, that  
19 it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself  
20 within the time limits established by this section. This stipulation also results from a continuance  
21 granted by the Court at defendant's request on the basis of the Court's finding that the ends of  
22 justice served by taking such action outweigh the best interest of the public and the defendant in  
23 a speedy trial.

24 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
25 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
26 must commence.

27 IT IS SO STIPULATED.  
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1 Dated: August 20, 2025  
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ERIC GRANT  
United States Attorney

3 By: /s/ JUSTIN J. GILIO  
4 JUSTIN J. GILIO  
5 Assistant United States Attorney

6 Dated: August 20, 2025  
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*/s/ Steven Crawford*  
Attorney for Defendant Anthony Varela

9  
10 **ORDER**

11 IT IS SO ORDERED that the status conference set for August 27, 2025, is vacated as Defendant  
12 Anthony Varela only. A change of plea hearing is set for **September 8, 2025, at 10:00 a.m. in**  
13 **Courtroom 5 before District Court Judge Dale A. Drozd.** Time is excluded pursuant to 18 U.S.C. §  
14 3161(h)(7)(A), B(i), B(ii), and B(iv).

15 IT IS SO ORDERED.

16 Dated: August 20, 2025

*/s/ Barbara A. McAuliffe*

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18 UNITED STATES MAGISTRATE JUDGE  
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